

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Actava TV, Inc., Master Call Communications, Inc.,)	
Master Call Corporation, and Rouslan Tsoutiev,)	
)	Index No.: 1:18-cv-06626
Plaintiffs,)	
)	
-against-)	
)	
Joint Stock Company “Channel One Russia Worldwide,”)	
Closed Joint Stock Company “CTC Network,” Closed)	
Joint Stock Company “New Channel”, Limited Liability)	
Company “Rain TV-Channel,” Open Joint Stock)	
Company “ACCEPT”, and Limited Liability Company)	
“Comedy TV,” and Kartina Digital GmbH,)	
)	
Defendants.)	
)	

NOTICE OF MOTION FOR PROTECTIVE ORDER

PLEASE TAKE NOTICE THAT, upon Proposed Sealed Exhibits A-C filed at ECF No. 246, and the accompanying Memorandum of Law in Support of the Motion for a Protective Order filed by Plaintiffs Actava TV, Inc. (“Actava”), Master Call Communications, Inc., Master Call Corporation, and Rouslan Tsoutiev (collectively, the “Actava Parties” or “Plaintiffs”), Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable Judge Kevin Fox, United States Magistrate Judge, for an order pursuant to Federal Rule of Civil Procedure 26(c) precluding Defendants from inquiring into matters that (i) pre-date, and which are covered by, a prior settlement agreement and release of claims; and which (ii) do not pertain to the claims and defenses raised in this action, and for any such other and further relief as the Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Rule 6.1 of the Local Rules of the United States District Court for the Southern and Eastern Districts of New York, Defendants’ opposition papers to Plaintiffs’ motion, if any, are to be served on the undersigned on

or before January 26, 2021, and Plaintiffs' reply papers, if any must be served no later than January 27, 2021.

Dated: New York, New York
January 19, 2021

Respectfully submitted,

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